

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

**THE DIAMOND CONSORTIUM, INC.
D/B/A THE DIAMOND DOCTOR, ET
AL**

Plaintiffs,

VS.

MARK HAMMERVOLD, ET AL,

Defendants,

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**Civil Action No. 4:17-CV-452**  
**Judge Mazzant**

**UNOPPOSED MOTION FOR LEAVE TO FILE EXCERPTS OF SWORN DEPOSITION  
TESTIMONY GIVEN BY MARK HAMMERVOLD UNDER SEAL**

In accordance with Eastern District of Texas Local Rule CV-5(a)(7), Plaintiffs Diamond Consortium, Inc. d/b/a the Diamond Doctor, et al file this Unopposed Motion for Leave to File Excerpts of sworn deposition testimony given by Mark Hammervold in Civil Action No. 4:16-cv-94, referenced in Plaintiff's Response to Motion to Proceed Pro Se, under seal. At the time that Hammervold gave the above-referenced deposition testimony his counsel designated same as "confidential". The excerpts of this deposition testimony that Plaintiffs seek to file under seal – unlike the Declaration of Mark Hammervold that was filed with this Court on August 8, 2018 – do contain personal financial information about Hammervold. Plaintiffs seek to have these deposition excerpts, and only these deposition excerpts, filed under seal. All other attachments to the above-referenced Response will not be filed under seal.

Counsel for Plaintiffs conferred with counsel for Defendants about the relief requested in this Motion on August 22, 2018, and Defendants' counsel (Varant Yegparian) advised that he is not opposed to the relief requested in this Motion.

Respectfully submitted,

**STECKLER GRESHAM COCHRAN**

/s/ Howard J. Klatsky

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**ATTORNEYS FOR PLAINTIFF  
DIAMOND CONSORTIUM, INC. and  
DAVID BLANK**

**CERTIFICATE OF COMPLIANCE**

This is to certify that counsel of record for Plaintiffs (Howard J. Klatsky) is serving the documents to be filed under seal to opposing counsel in electronic form on August 22, 2018.

/s/ Howard J. Klatsky  
**HOWARD J. KLATSKY**

**CERTIFICATE OF SERVICE**

Pursuant to Fed. R. Civ. P. 5(b), I hereby certify that on the 22<sup>nd</sup> day of August, 2018, I served a true and correct copy of the foregoing instrument has been mailed, telecopied or hand delivered to all attorneys of record in this cause of action as follows.

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/s/ Howard J. Klatsky  
**HOWARD J. KLATSKY**